

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CRYSTAL MCKINNEY,

Plaintiff,

-against-

SEAN COMBS a/k/a “P. DIDDY,” BAD BOY  
ENTERTAINMENT LLC d/b/a BAD BOY  
RECORDS, BAD BOY ENTERTAINMENT  
HOLDINGS, INC., SEAN JOHN CLOTHING  
LLC, and DADDY’S HOUSE RECORDINGS,  
INC.,

Defendants.

No. 24-cv-3931

**DECLARATION OF  
ERICA A. WOLFF  
IN FURTHER SUPPORT OF  
MOTION TO DISMISS THE  
AMENDED COMPLAINT**

**ERICA A. WOLFF** declares as follows:

1. I am a partner at the law firm Sher Tremonte LLP, counsel for Defendants Sean Combs, Bad Boy Entertainment LLC (named incorrectly as Bad Boy Entertainment LLC d/b/a Bad Boy Records), Bad Boy Entertainment Holdings, Inc., Sean John Clothing LLC, and Daddy’s House Recordings, Inc. (together, the “Combs Defendants”), in the above-captioned action. I have personal knowledge of the facts and circumstances set forth herein.

2. I submit this declaration in further support of the Combs Defendants’ motion, pursuant to Fed. R. Civ. P. 12(b)(6), for an order: (a) dismissing all claims in the Amended Complaint, dated August 1, 2024 (ECF No. 19), against them with prejudice; and (b) granting such other and further relief as this Court deems just and proper.

3. Attached as **Exhibit A** is a copy of the Decision and Order on the Motion to Dismiss, dated May 23, 2024, filed in *Stein et al. v. The Rockefeller University Hospital*, Index No. 0159929/2023 (N.Y. Sup. Ct. Nov. 16, 2023) at NYSCEF No. 44.

4. Attached as **Exhibit B** is a copy of the Decision and Order on the Motion to Dismiss, dated May 25, 2024, filed in *JL v. The Rockefeller University Hospital*, 2023 N.Y. Slip Op. 31877[U] (N.Y. Sup. Ct. June 1, 2023) at NYSCEF No. 52.

Dated: New York, New York  
January 7, 2025

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*Erica A. Wolff*  
ERICA A. WOLFF